

May 13, 2010

RESEARCH GENERAL POST FUNDS

1. PURPOSE: To provide South Texas Veterans Health Care System policy for the acceptance and use of gifts and donations to be deposited in General Post Fund (GPF) accounts for the support of medical research activities.

2. POLICY:

a. **Donations to the Research General Post Fund** are to be assigned to the system Director for research support within the system, not to designated investigators. These include gifts and donations of equipment and supplies as well as funding by nonprofit foundations, private donors, and companies. The Director and/or his designees may authorize expenditures from the balances of the GPF accounts for the purpose or purposes for which the funds have been specifically designated by the donor.

b. **Prior Central Office approval is required** for GPF facility construction projects exceeding \$15,000 in estimated costs, including the cost of equipment, facility labor and materials, or purchase of equipment designated as Central Office controlled. These requests will be prepared in accordance with DM&S Supplement, MP-4, Part VII.

c. **Funds deposited** in earmarked GPF accounts may be used for employee travel provided that the travel is essential to the conduct of the approved project and the donation is not exclusively for travel or travel related expenses of VA staff members. Travel will be authorized and performed in accordance with VA directives and standardized travel regulations.

d. **Research GPF money may not be transferred between medical centers.**

e. **Employees** will not be journalized to the GPF and direct expenditures will not be made from the fund for personal services and benefits. In those instances where personal services are required to accomplish the purposes specified by the donor, the appropriation from which the employee is paid will be reimbursed from the General Post Fund for the actual personal services and benefits expense.

f. **When funds donated for a specific purpose** are expended to the extent that further execution of the purpose specified is impracticable, residual balances will be transferred to the applicable general purpose account. However, if the residual balance is one hundred dollars or more, reasonable effort will be made to obtain the approval of the donor before the residual balance is transferred to the general purpose account.

g. **Officials and employees of the VA** will NOT solicit contributions from the public nor will they authorize the use of their names, the name of the Administrator, or the name of the VA by any individual or organization in any campaign or drive for money or articles for the purpose of making a donation to the VA. This restriction does not preclude discussion with the individual offering a gift or donation to the General Post Fund for research relative to the gift or

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donation offered. However, the discussion should also serve to acquaint the potential donor with the policies and regulations pertaining to the Research General Post Fund. Such discussion shall not be initiated by VA officials and employees.

3. ACTION:

a. The Director has overall responsibility for the acceptance and use of funds, equipment, and supplies for medical research programs (including authorizing expenditures for travel and related costs utilizing earmarked GPF accounts).

b. Within delegated authority, the Research and Development Committee and the Associate Chief of Staff for Research and Development are responsible for the propriety of donations and the administration of donations for medical research programs.

c. Proposed gifts of equipment and property are to be brought to the attention of the Chief, Engineering Service, and Chief, Supply Service, as appropriate, prior to acceptance of the donation and prior to endorsements and recommendations being submitted to the Director for approval.

d. The Fiscal Service Accounting Section will maintain all GPF accounts to include records on all donations as well as the conduct of periodic audits.

e. The Director, Associate Chief of Staff for Research and Development, and the Chief of Staff are authorized to approve withdrawals from Research General Post Funds

f. Those delegated endorsement responsibility or administering authority are to acquaint themselves with the references listed in paragraph 5 of this memorandum.

g. Procedures for accepting gifts and donations and establishing GPF account:

(1) **All gifts and donations for research**, payable to the order of the Department of Veterans Affairs, shall be received in the General Post Fund. These gifts and donations require prior approval of the system's Research and Development Committee and Director

(2) **The Associate Chief of Staff for Research and Development** is to submit his endorsement and recommendation of the Research and Development Committee through the Chief of Staff to the Director. When practicable, the endorsement is to contain an estimated expenditure schedule. In all instances, endorsements are to contain specific wording as to the purpose(s) of the project for which the funds are to be utilized

(3) **Once the Director's approval is obtained**, copies of all documents proposing gifts and donations, individual system officer's and committee's endorsements, and the Director's approval are to be forwarded to the Chief, Fiscal Service, Attention: Accounting Section, in order that a GPF account may be established and properly maintained.

(4) **The Accounting Section Chief, Fiscal Service**, is to notify (in memo form) the ACOS for Research and Development and the Agent Cashier once the GPF account is established.

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(5) **Once donations are received**, they are to be immediately forwarded to the Chief, Fiscal Service, Attention: Agent Cashier, where they are placed in deposit to the appropriate account. Copies of deposit receipts are to be forwarded to the Research Service.

(6) **The Research Service** will prepare a letter of appreciation for the Director's signature to be sent to donors. Letters also will acknowledge with thanks those offers that cannot be accepted, indicating reasons for non-acceptance. Letters acknowledging gifts over \$500 must detail the use of the funds, including information such as estimated expenditures for travel, administrative costs, etc., related to accomplishing the research for the purpose of the donation. In the written acknowledgment, the Director will inform the donor or proposed donor of the policies and procedures according to which the gift or donation will be received in the Research General Post Fund and be administered at the facility. The Director must inform outside sponsors of research, including drug companies, that:

(a) The studies will be performed by VA investigators as part of their official VA duties,

(b) Federal law prohibits all VA employees from receiving compensation from outside the Agency for services performed in connection with their official VA duties and prohibits anyone from providing such compensation, and

(c) All payments in connection with the studies should be made to the General Post Fund and not to individual VA investigators. This information must be provided before donations to the General Post Fund are accepted and before studies are initiated in the VA facility. One way of acquainting donors with these policies is to enclose a copy of the Research General Post Fund policy.

(7) **All donated equipment items must be received through the Supply Service at the General Warehouse, accompanied by an appropriate VAF 07-2237, fully describing the item, its cost, and point of use or delivery.** All donors are to be advised of this requirement and all employees concerned are to insure compliance. For property accounting, the Supply Service is to be advised in writing by the accepting activity of the acceptance of all donated supplies and equipment. Copies of the communications are to be forwarded to the Fiscal Service for accounting purposes.

h. Procedures for requesting supplies and services to be charged against an established GPF account:

(1) **The Principal Investigator** will initiate a request to the ACOS for Research and Development to use Research General Post Funds for R&D Committee approved research projects.

(2) **The request** will be presented to the hospital's Research and Development Committee and recorded in the Committee's minutes.

(3) **The Research and Development Committee Chairman** will initial approved requests and the ACOS for Research and Development or Chief of Staff will be the signature authority.

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(4) **Upon approval**, requests are to be submitted to the Fiscal Service and then Acquisition and Materials Management Service for procurement in accordance with VA procurement regulations. All purchase requests must be approved through Fiscal Service prior to purchasing by Acquisition Materials Management Purchasing Section.

4. REFERENCES: MP-4, Part V; MP-4, Part VII, chapter 4, DM&S Supplement; MP-1, Part II, Chapter 2; M-3, Part I.

5. RESPONSIBILITY: Associate Chief of Staff for Research and Development (151)

6. RESCISSIONS: STVHCS Policy Memorandum 151-06-01 dated November 21, 2006.

7. RESCISSION: May 2015

(Original signature on file)

MARIE L. WELDON, FACHE
Director

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